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JUL 27 2007

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of: Scott J. Clifford et al.)
Serial No.: 10/691,763) Group Art Unit: 1734
Filed: October 23, 2003) Examiner: G. Koch
For: <u>Modular Painting Apparatus</u>) Attorney Docket: 132815-7 (formerly 16129)

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

DECLARATION OF MARTIN D. ROLA UNDER 37 CFR 1.132

Honorable Sir:

Martin D. Rola declares as follows:

1. I received a Bachelor of Science degree in Electrical Engineering in 1990 from the University of Michigan and a Masters of Electrical Engineering in 1992 from Stanford University

2. From 1997 to date, I have been employed by Fanuc Robotics America, Inc., Rochester Hills, Michigan, assignee of the above application. My present position is Director of Engineering, Paintshop Automation Group.

3. I have reviewed the declaration document, dated July 17, 2007 of Scott Clifford and Paul Copioli, inventors of the above identified patent application.

4. I can attest to the market impact this machine has had to the industry and in the unique benefits it brings to an end user.

5. The P-500 has been the most successful new painting product introduced by FANUC Robotics America.

6. Previous to the P-500 product, FANUC received very few sales in moving-line exterior bell systems.

7. In general, most customers did not find significant value in the robotic systems (whether provided by FANUC or other companies) offered at that time compared to other technologies such as bell machines.

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8. Since its introduction, many customers including General Motors, Ford, Chrysler, and Subaru have recognized the unique benefits of the P-500 system and have standardized on it for their new paint shops in North America.

9. Customers have stated that the P-500 is an excellent product for exterior painting and is unique in its simplicity of design that provides simpler use and its kinematics design which provides smaller paint shops.

10. Our market share in this segment is estimated to have increased six-fold since the P-500 introduction and FANUC Robotics America now is the clear leader with an estimated market share exceeding 65%.

11. Painting suppliers have acknowledged the overall performance of the P-500 system as being excellent in terms of rapid production launches and overall process stability.

12. The P-500 has been an "industry changing" product to a greater extent than any other painting product introduced by FANUC Robotics America.

13. Papers and presentations that I have written describing how the P-500 has introduced a "New Phase" in Robotic Painting have been reviewed, acknowledged, and accepted by the professional review committees of conferences in both the United States and Europe and also by a top magazine in the industry.

14. Since the introduction of the P-500, several of our competitors have attempted to introduce products imitating its performance benefits.

15. I have over fifteen years of experience in robot system design and programming and currently oversee the group in my division responsible for these areas.

16. There have been a very large number of cases where my engineering group has used the unique kinematics design of the P-500 to provide painting systems that require significantly less area than that required by other robotic solutions or bell machines.

17. In many cases, the reduction in area made a significant positive impact on the customer's decision in purchasing the P-500.

18. I have also observed a significant improvement in the time required to install and optimize systems with the P-500 compared to other robotic solutions and attribute a large part of this to the ease of use achieved with the P-500 design.

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19. I further declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code, and that such willful false statements may jeopardize the validity of the above-referenced application or any patent issuing thereon.

Date: July 23, 2007By Martin D. Rola
MARTIN D. ROLA

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(x) *Related Proceedings Appendix:*

None.